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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**EUGENE DIVISION**

**UNITED STATES OF AMERICA,**

**6:21-mc-1298**

**Plaintiff,**

**v.**

**UNOPPOSED MOTION TO  
EXTEND 90-DAY PERIOD  
PURSUANT TO  
18 U.S.C. § 983(a)(3)(A)**

**2018 TESLA X SEDAN VIN:  
5YJXCAE24JF126905, ITS  
ITS TOOLS AND APPURTENANCES,  
and 2013 LEXUS RX450H SUV, VIN:  
JTJBC1BA5D2450522, ITS TOOLS  
AND APPURTENANCES, *in rem*,**

**Defendants.**

Pursuant to Local Rule 7-1, counsel for the United States certifies that I have contacted Jason Thompson, attorney for claimant Yongkang Chen, who concurs with this extension.

On September 15, 2021, Yongkang Chen filed a claim in a non-judicial civil forfeiture proceeding by the Drug Enforcement Administration to the 2018 Tesla X Sedan and the 2013 Lexus RX450h SUV seized from Yongkang Chen on or about March 17, 2021.

No other person filed a claim in the administrative forfeiture proceeding.

As provided in 18 U.S.C. § 983(a)(3)(A), the United States and Yongkang Chen, agree to extend the time in which the United States will file a complaint for forfeiture against the 2018 Tesla X Sedan and the 2013 Lexus RX450h SUV or to obtain an indictment alleging that the assets are subject to forfeiture. Yongkang Chen agrees that the deadline by which the United States shall be required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture shall be extended to Monday, March 14, 2022.

Yongkang Chen agrees that until the United States files a complaint for forfeiture against the assets and/or obtains an indictment alleging that the assets are subject to forfeiture, or until March 14, 2022, or until the parties reach a settlement regarding the property, whichever occurs first, the property shall remain in the custody of the United States and Yongkang Chen shall not seek its return for any reason in any manner.

DATED: **December 1, 2021**

Respectfully submitted,

SCOTT E. ASPHAUG  
Acting United States Attorney

s/ Judith R. Harper  
**JUDITH R. HARPER**  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have made service of the foregoing Motion to Extend 90-Day Period and a proposed Order on the party herein by sending via email on December 1, 2021 to:

Jason Thompson  
[jason@thompsonlawllc.com](mailto:jason@thompsonlawllc.com)  
Attorney for claimant Yongkang Chen

*s/Dawn Susuico*  
DAWN SUSUICO  
Paralegal